



U.S. Department of Justice

Antitrust Division

*Liberty Square Building
450 5th Street, N.W., Suite 8000
Washington, DC 20001*

*william.stallings@usdoj.gov
Tel: (202) 514-9323
Fax: (202) 307-2784*

June 16, 2014

Honorable Andrew L. Carter
United States District Court
Southern District of New York
40 Foley Square, Room 435
New York, NY 10007

Re: *United States and State of New York v. Twin America, LLC et al.*, No. 12-CV-8989
(ALC) (GWG), Response to Request by Defendants to Extend Page Limits for Summary
Judgment Briefing

Dear Judge Carter:

In the Joint Preliminary Trial Report (Document #59), Defendants state that they intend to move for summary judgment on two grounds: (1) that the “undisputed facts” of entry show that “the Government cannot meet its burden to prove barriers to entering the alleged market,” and (2) that Plaintiffs are not entitled to the relief of disgorgement as a matter of fact or law. While Plaintiffs dispute Defendants’ entry and disgorgement claims as a matter of fact and law, we respectfully submit that these issues can be fully briefed within the standard page limits under Your Honor’s rules and that no extension is necessary.

Sincerely,

/s/

William H. Stallings
Attorney for Plaintiff United States

cc: Eric Stock (via e-mail), *Attorney for Plaintiff State of New York*
Thomas O. Barnett (via e-mail), *Attorney for Defendants Coach USA, Inc. and
International Bus Services, Inc.*
Michael P.A. Cohen (via e-mail), *Attorney for Defendants Twin America, LLC,
CitySights LLC and City Sights Twin, LLC*